

Exhibit 42

<p style="text-align: right;">Page 42</p> <p>1 - Comparator6 -</p> <p>2 managing programmers or engineers in your role as 3 chief compliance officer?</p> <p>4 A. The team of 250 people who worked in 5 the group who were subject to my strategic 6 direction were a mix of programmers, engineers, 7 solutions architects, product managers. So my own 8 sense is that I was more of the manager of that 9 program -- I was strategic manager of that 10 program at least from 2005 to 2016 because that 11 was -- that was probably the major initiative in 12 the compliance group.</p> <p>13 Q. Were those -- that group of 250, were 14 they considered to be part of the compliance 15 department or part of the IT group?</p> <p>16 A. They were part of the IT department 17 and they reported to the IT department, but they 18 were responsive to our strategic decision-making.</p> <p>19 So by way of contrast, before I went 20 back to Morgan Stanley the -- the IT department 21 basically told the compliance department what they 22 were working on. When I returned to Morgan 23 Stanley, I -- I made the decision, and the IT 24 department agreed, that the strategic direction 25 would be set by me; and so I was the one who set</p>	<p style="text-align: right;">Page 44</p> <p>1 - Comparator6 -</p> <p>2 Morgan Stanley.</p> <p>3 Q. In the last year you were there?</p> <p>4 A. Not the last -- the last year I was 5 doing more advisory work for the general counsel, 6 so probably the last -- the two years before that.</p> <p>7 Q. Well, I think you said you were 8 exploring it. If you used a different word, I 9 apologize. Had Morgan Stanley actually adopted 10 machine learning at that point in time?</p> <p>11 A. I don't recall.</p> <p>12 Q. Do you have a Ph.D. or Masters of 13 Science in computer science?</p> <p>14 A. I do not.</p> <p>15 Q. Do you have a Ph.D. or Master of 16 Science in a related technical field --</p> <p>17 MR. GAGE: Objection.</p> <p>18 Q. -- of computer science?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. We went through my background before. 21 You know that I have a JD from Columbia University 22 School of Law. That's my -- my -- my final 23 educational experience.</p> <p>24 Q. And so is the answer no, you do not 25 have a Ph.D. or MS in the technical field related</p>
<p style="text-align: right;">Page 43</p> <p>1 - Comparator6 -</p> <p>2 the strategic direction and the tactical projects 3 they were working on as opposed to the other way 4 around. This is what it had been when I wasn't 5 there.</p> <p>6 Q. So is it fair to say that compliance 7 was the business partner that that IT group was 8 supporting?</p> <p>9 A. Correct.</p> <p>10 Q. In any of the roles that we've 11 discussed thus far, did you work with cloud 12 technology?</p> <p>13 A. No.</p> <p>14 Q. In any of the roles that we've 15 discussed thus far, did you work with machine 16 learning?</p> <p>17 A. Yes.</p> <p>18 Q. In what capacity?</p> <p>19 A. Machine learning was -- machine 20 learning became foundational to compliance systems 21 and we were exploring ways to use machine learning 22 in what we were doing.</p> <p>23 Q. During what period of time?</p> <p>24 A. Later, later in time. I don't know 25 precisely when, but towards the end of my time at</p>	<p style="text-align: right;">Page 45</p> <p>1 - Comparator6 -</p> <p>2 to computer science.</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. That's a different question than the 5 one you just asked, so the answer is no.</p> <p>6 Q. Have you ever built an engineering 7 team?</p> <p>8 MR. GAGE: Objection.</p> <p>9 A. Well, at Google Cloud yeah, we 10 created an engineering team to support the 11 financial services vertical.</p> <p>12 Q. Okay. In the roles that we've 13 discussed thus far ending with your time as an 14 advisor -- as partner at McKinsey in 2017 or 2018, 15 up until that point in time had you ever built an 16 engineering team?</p> <p>17 A. No.</p> <p>18 MR. GAGE: Objection.</p> <p>19 Q. Up through the end of your time at 20 McKinsey in 2018, had you ever managed an 21 engineering team?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Again, you know, just to be 24 con -- it's question of what you mean by 25 "managed," but again I make reference to the team</p>

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1 - [Comparator6] -	1 - [Comparator6] -
2 that supported my group for which I provided	2 Q. Okay.
3 strategic direction and tactical direction at	3 MS. GREENE: We have been going about
4 Morgan Stanley.	4 an hour. I don't know if anyone is in need
5 Q. And apart from that you never	5 of a break. If so, this would be a good time
6 directly managed an engineering team, correct?	6 for a five-minute break or I'm happy to
7 A. No.	7 continue pushing on.
8 Q. Do you have any technical --	8 MR. GAGE: You can keep going.
9 A. I'm sorry, I guess the answer to that	9 THE VIDEOGRAPHER: Okay standby. The
10 question would be yes because you said "never," so	10 time is 10:29 a.m. and we're going off the
11 I think you want me to say yes and not no. I	11 record.
12 apologize for speaking over you.	12 (Whereupon, there was a brief recess
13 Q. So the answer is you never managed an	13 in the proceedings.)
14 engineering team directly, correct?	14 THE VIDEOGRAPHER: The time is 10:36
15 MR. GAGE: Objection.	15 a.m. and we're back the record.
16 A. Yes.	16 Q. Mr. [Comparator6], when did you join
17 Q. Have you had any technical training	17 Google?
18 with respect to computer science?	18 A. July, 2018.
19 A. No.	19 Q. And how did you come to join Google?
20 Q. Have you had any technical training	20 A. I was recruited.
21 with respect to computer engineering?	21 Q. By whom?
22 A. No.	22 A. Tariq Shaukat, T-A-R-I-Q
23 Q. Have you had any technical training	23 S-H-A-U-K-A-T.
24 with respect to coding?	24 Q. Did you know Mr. Shaukat prior to
25 A. No.	25 being recruited by him?
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1 - [Comparator6] -	1 - [Comparator6] -
2 Q. Have you had any technical training	2 A. I did not. I received a phone call
3 with respect to programming?	3 from Spencer Stuart that they were conducting an
4 A. No.	4 executive search and I participated in the search
5 Q. Do you know how to code?	5 and that's how I met Tariq.
6 A. No.	6 Q. Do you know how Spencer Stuart got
7 Q. Do you know how to program?	7 your name?
8 A. I'm sorry, what's -- what's the	8 A. I -- I don't. I assume it was some
9 question?	9 mix of I had spoken to them several times over the
10 Q. Do you know how to do computer	10 years when I was at Morgan Stanley. As I was
11 programming?	11 retiring I talked about opportunities with one of
12 A. What was the question before that?	12 their senior partners, and then obviously
13 Maybe I missed it. I thought that was the same	13 my -- as you've seen, my resume is on LinkedIn and
14 question.	14 I have a fairly good reputation, so they thought I
15 Q. First I asked if you know how to	15 might fill the bill.
16 code.	16 Q. Who is Ruth Porat?
17 A. No, then you said do you know how to	17 A. Ruth Porat is the chief financial
18 program and then you said do I know how to	18 officer of Alphabet.
19 computer program, is that --	19 Q. And do you know her?
20 Q. Let me just ask a few questions just	20 A. I do.
21 to make sure the record is clear. Do you know how	21 Q. How do you know her?
22 to code?	22 A. Probably -- and I don't remember
23 A. No.	23 whether it was 1988 or 1989 -- she was the
24 Q. Do you know how to program?	24 mergers and acquisitions associate at Morgan
25 A. No.	25 Stan -- associate, yeah. She was a mergers and

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<p>1 - [Comparator6] -</p> <p>2 A. No, the only one I pointed Stuart 3 Vardaman to was -- was Ruth. Vardaman, 4 V-A-R-D-A-M-A-N.</p> <p>5 Q. Did you participate in any job 6 interviews in connection with your hiring by 7 Google?</p> <p>8 A. Yeah, I was interviewed.</p> <p>9 Q. How many times?</p> <p>10 A. Three.</p> <p>11 Q. Were any of those group interviews?</p> <p>12 A. I'm sorry, were any of those what?</p> <p>13 Q. Group interviews.</p> <p>14 A. No.</p> <p>15 Q. Do you recall who it was that you 16 interviewed with?</p> <p>17 A. Yes.</p> <p>18 Q. And who was that?</p> <p>19 A. I had a phone interview with Tariq 20 which then led to an in-person interview -- a set 21 of in-person interviews in Sunnyvale with Diane 22 Greene, Tariq Shaukat again, Greg Moore, Fiona 23 O'Donnell who was on a video con, and that was it. 24 I was supposed to meet with Kevin Piraino, but he 25 had not completed the Google interview training so</p>	<p>1 - [Comparator6] -</p> <p>2 A. Didn't I just say that?</p> <p>3 Q. If you can, answer the questions that 4 I've asked you.</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. Yes.</p> <p>7 Q. And were you -- at the time you were 8 being recruited, were you told what your job title 9 would be?</p> <p>10 A. No.</p> <p>11 Q. At the time you were being recruited, 12 was the future development of the role discussed 13 in any way?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. I don't know what that means.</p> <p>16 Q. At the time you were being recruited, 17 did you have any discussions about where or how 18 the role might develop over time?</p> <p>19 A. The role is a new role. It didn't 20 exist before, so the role as described it was 21 future looking. I wasn't replacing somebody. The 22 role didn't exist.</p> <p>23 Q. Were there any discussions on what 24 the role might look like down the road in two 25 years, five years, anything like that?</p>
<p>1 - [Comparator6] -</p> <p>2 we adjourned that one, and then subsequently I met 3 with Brian Stevens in New York personal -- in 4 person rather, in person I think on Google campus.</p> <p>5 Q. During the time that you were being 6 recruited by Google, how was the role for which 7 you were being recruited described to you?</p> <p>8 A. The role that was described to me was 9 that in the Cloud the major opportunity for Google 10 Cloud was in regulated industries, which had a set 11 of imperatives -- a set of customer imperatives 12 that had to be met and that the role I was being 13 recruited for was two-fold.</p> <p>14 One to internal facing to help 15 explain to a product developer, the engineers why 16 those -- what those requirements were and why they 17 matter. And then, two, to act as a bridge to 18 customers and help give them comfort that Google 19 is responsive to the regulatory imperatives that 20 they needed to meet in order to adopt Google 21 Cloud.</p> <p>22 Q. Was it described to you that you 23 would have any role with respect to representing 24 Google externally or internally in your industry 25 areas?</p>	<p>1 - [Comparator6] -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Yeah, yes.</p> <p>4 Q. And what was the discussion with 5 respect to that?</p> <p>6 A. The idea was to build out a team that 7 was aware of, responsive to regulatory imperatives 8 globally, help set an agenda for those as well, 9 help explain them to -- you know, help advocate 10 for them internally and help sell them externally 11 to senior -- to the customer -- senior executives 12 and customers, give them assurances that 13 Google Cloud was a place for regulated industries 14 to -- to come do business.</p> <p>15 Q. And was it described to you as an 16 individual contributor role or a managing role?</p> <p>17 A. Both, because initially there was 18 just me and then ultimately there was to be a team 19 supporting it.</p> <p>20 Q. What was your title when you joined 21 Google?</p> <p>22 A. Managing director of technology and 23 policy I think.</p> <p>24 Q. Was that a title you selected for 25 yourself?</p>

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1	- Comparator6 -	- Comparator6 -
2	were being paid at McKinsey?	Q. And is this the final offer letter
3	A. Probably not.	that you received?
4	Q. Do you know whether they were aware	A. To my knowledge I -- I signed it, so
5	of what you were being paid at McKinsey?	I'm assuming this is the last one. You know, I'm
6	A. Don't know.	sorry, to -- to your point, no, to my knowledge
7	Q. At the time that you joined Google,	there was no subsequent one. This was it.
8	you still had outstanding RSQs from Morgan -- I'm	Q. And did you negotiate any component
9	sorry, outstanding awards, deferred awards from	of this offer letter?
10	Morgan Stanley, correct?	A. No.
11	A. Correct.	Q. If I can direct your attention to the
12	Q. Did you forfeit any of those awards	salary.
13	by virtue of joining Google?	A. Yes, got it.
14	A. No.	Q. The 325,000, is that your
15	Q. And so no portion of the initial	recollection as to what your salary was at the
16	equity award from Google was replacement equity	time you joined?
17	for amounts that you were losing by virtue of	A. Yes.
18	joining?	Q. Under "Bonus Target" it says, "Your
19	A. Sorry, there's -- there's just a	annual bonus target will be 40 percent of your
20	negative embedded in there. I want to make sure	base salary." Is that the annual cash bonus that
21	I answer the question properly. So no portion	you were referring to when we spoke earlier?
22	was -- yeah -- yes, no portion -- no portion was	A. Yes.
23	made good.	Q. And with respect to equity
24	Q. Okay. If we can go back to Box,	compensation does this reflect that you received
25	we're going to look at another document.	two awards, one for 4 million and one for 100,000?
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1	- Comparator6 -	- Comparator6 -
2	A. Okay, let me -- let me minimize. I	A. Yeah. So I was basically right when
3	don't need to minimize -- yeah. Got it, okay.	I said it before, yeah.
4	Back in the Box, yes.	Q. Okay, and do you recall receiving
5	Q. And if you hit refresh, you should	both of those awards?
6	see Tab 13.	A. Well, both awards were deposited into
7	A. Hold on, let me refresh. Okay, got	a -- a brokerage account at Morgan Stanley, yeah.
8	Tab 13. Open it?	Q. What was your level in Google at the
9	Q. Right.	time of your hire?
10	A. Opened, yes, got it.	A. I didn't know. I came to learn I was
11	Q. I'm going to mark --	an L 9.
12	A. So Hold on, it keeps giving me hints	Q. When did you come to know that you
13	on how to use Box.	were an L 9?
14	Okay, got it.	A. At some point. I'm sorry, some point
15	Q. We're going to mark this as Exhibit	subsequent to my hiring. I -- I don't remember
16	13. Exhibit 13, Bates stamped G002 -- I'm sorry,	exactly when.
17	GOOG-ROWE-00060576 through 578.	Q. Was it while you were still at
18	(Whereupon, Exhibit 13 was marked at	Google?
19	this time.)	A. Yeah. Sorry, do you want me to
20	Q. Do you recognize this document?	continue looking at this or do you want me to come
21	A. Hold on.	back to the video, what would you like?
22	Yes.	Q. We're done with this document if you
23	Q. And what do you recognize this	want to put it aside.
24	document to be?	A. Okay, let me come back to you. Hold
25	A. The offer letter from Google to me.	on.

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1	- Comparator6 -		- Comparator6 -
2	Thank you.		industry alliances, something like -- whatever
3	Q. Is a managing director in Google the		Tariq's group. They had some name, but something
4	same as a director?		like that. Some name like vertical platforms
5	MR. GAGE: Objection.		industry alliances I think was probably the name
6	A. I always found that somewhat		at the time.
7	confusing. I didn't know -- some of the corporate		Q. And it's your testimony that it's
8	titles I didn't understand, so I don't know		whatever the group was that Tariq Shaukat managed?
9	whether our managing director and a director are		A. Yes.
10	just the same or different.		Q. Do you know -- are you familiar at
11	Q. Do you know whether Levels 8 and 9		Google with the concept of ladders?
12	are considered director level roles at Google?		A. Yes.
13	A. I don't know that.		Q. And do you know what your ladder was?
14	Q. Did you negotiate with Google your		A. No.
15	level?		Q. Was your ladder ever shared with you?
16	A. No. I assume my level was based on		A. Not my recollection.
17	my years of experience and my, you know, value to		Q. Did you ever see the ladder?
18	the organization.		MR. GAGE: Objection.
19	Q. Did they tell you what your level was		A. Not to my recollection.
20	based on?		Q. What was your reporting line in the
21	A. No, I just assumed that's how they		position you held at the time you joined Google?
22	came to conclude it. You know, I had 30-plus		MR. GAGE: I'm sorry, can you say
23	years of experience in financial services. I had		that again. There was some paper shuffling,
24	worked with, you know, CEOs, a close advisor to		Cara.
25	CEOs. In my McKinsey time I also worked with		A. Yeah.
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1	- Comparator6 -		- Comparator6 -
2	financial institutions globally and in times of		Q. What was your reporting line in the
3	crisis. So I -- you know, they thought I was		position you held at the time you joined Google?
4	sufficiently senior.		A. I reported to Tariq Shaukat.
5	Even -- even my time at Google, you		Q. Do you recall what Mr. Shaukat's
6	know, I met with very senior people at Google. I		title was at the time?
7	met with regulators along with senior people, so		A. Well, he was co -- he was
8	that's -- I don't know. Didn't seem -- didn't		co-president of Google Cloud along with P.H.
9	surprise me I was a Level 9.		Ferrand and he -- I think his corporate title
10	Q. To be clear, though: No one at		was -- was senior VP, but I don't remember that
11	Google ever communicated to you the basis for your		for sure.
12	level; is that correct?		Q. Do you know what his level was?
13	A. Right, other than through my		A. Only by hypothesis that if -- if I
14	assumptions.		was 9, he had to be 10.
15	Q. At the time you were hired, did		Q. Now, at the time you were hired, was
16	anyone on behalf of Google explain to you the		it your understanding that you were hired to lead
17	factors that were dictating what your salary,		the customer-facing regulatory and compliance
18	bonus, and compensation was?		engagement for Google Cloud globally?
19	A. No. No.		A. No.
20	THE WITNESS: Sorry, Hope.		Q. Was it your understanding that you
21	A. No.		would be responsible for building a global team to
22	Q. At the time you joined Google, what		work with customers and partners across
23	group or organizational unit did you work in?		industries?
24	A. What's it called. Industry		A. You're talking about at the time I
25	plat -- industry -- was it vertical platforms and		was hired?

<p style="text-align: right;">Page 70</p> <p>1 - [Comparator6] -</p> <p>2 Q. Yes.</p> <p>3 A. That was one component of the job</p> <p>4 that I was hired to do, yes.</p> <p>5 Q. At the time you -- you were hired,</p> <p>6 did you understand that you were expected to work</p> <p>7 closely with the product and engineering teams in</p> <p>8 GT and GPT?</p> <p>9 A. Yes.</p> <p>10 Q. At the time you were hired, did you</p> <p>11 understand that you were being hired into a role</p> <p>12 that was primarily focused on regulatory and</p> <p>13 compliance work?</p> <p>14 A. No.</p> <p>15 Q. Did you understand it to be an</p> <p>16 engineering role?</p> <p>17 A. No.</p> <p>18 Q. Was it your understanding that you</p> <p>19 would be responsible for working with customers</p> <p>20 and partners to explain how Google Cloud meets</p> <p>21 their compliance and regulatory needs?</p> <p>22 A. Yes.</p> <p>23 Q. Was it your understanding that you</p> <p>24 would be responsible for creating a plan for what</p> <p>25 certifications and approvals were needed to</p>	<p style="text-align: right;">Page 72</p> <p>1 - [Comparator6] -</p> <p>2 posed, it suggested that -- that it was that to</p> <p>3 the exclusion of all other things. That was one</p> <p>4 component of what I was doing; that was not the</p> <p>5 sole purpose of the role.</p> <p>6 So the things you've now detailed are</p> <p>7 things that were -- were well within the ambit of</p> <p>8 my responsibility there, but I understood that</p> <p>9 question to mean are you -- were you singularly</p> <p>10 doing a regulatory compliance role at Google Cloud</p> <p>11 and the answer was no. It was all those other</p> <p>12 things that you just set out.</p> <p>13 Q. Let me just say it one more time and</p> <p>14 then you can answer yes or no whether it's true or</p> <p>15 not true. Was it your understanding that your</p> <p>16 role was to lead regulatory and compliance on the</p> <p>17 business and customer side for Google Cloud?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. Could you say it again?</p> <p>20 Q. Yes. Was it your understanding that</p> <p>21 your role was to lead regulatory and compliance on</p> <p>22 the business and customer side for Google Cloud?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. At the time I was hired, yes? Ms.</p> <p>25 Greene, at the time I was hired? I'm asking you a</p>
<p style="text-align: right;">Page 71</p> <p>1 - [Comparator6] -</p> <p>2 maximize market traction?</p> <p>3 A. No.</p> <p>4 Q. Did you understand at the time you</p> <p>5 were hired that your responsibilities included</p> <p>6 meeting engagement with regulators on regulatory</p> <p>7 issues?</p> <p>8 A. Yes.</p> <p>9 Q. Did you understand that your role was</p> <p>10 global and cross-vertical?</p> <p>11 A. Yes. And going back to the</p> <p>12 certifications: So I was not the one creating the</p> <p>13 plan, but I was working with others who created</p> <p>14 the plan. I was the primary input to that, but I</p> <p>15 was not the actual plan creator for the</p> <p>16 certifications.</p> <p>17 Q. So --</p> <p>18 A. That's what in fact I did in my time</p> <p>19 there.</p> <p>20 Q. So I just want to make sure on I'm</p> <p>21 clear on this: Is it your testimony that you did</p> <p>22 not understand the role to be a regulatory and</p> <p>23 compliance-focused role?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. That -- the way the question was</p>	<p style="text-align: right;">Page 73</p> <p>1 - [Comparator6] -</p> <p>2 question.</p> <p>3 Q. Is that a question?</p> <p>4 A. Yes, that's a question.</p> <p>5 Q. Yes. At the time you were hired, was</p> <p>6 that your understanding of the role?</p> <p>7 A. That was a major component of the</p> <p>8 role, yes.</p> <p>9 Q. In terms of your qualifications, did</p> <p>10 you understand that for the role that you were</p> <p>11 hired into at Google, you needed to demonstrate a</p> <p>12 comprehensive understanding of how Google shapes</p> <p>13 the industry?</p> <p>14 A. Yeah. (Unintelligible crosstalk) I'm</p> <p>15 sorry -- I'm sorry, yes. I apologize, yes.</p> <p>16 Q. Was another qualification that you be</p> <p>17 recognized as an authority in multiple function</p> <p>18 areas?</p> <p>19 A. Yes.</p> <p>20 Q. Was another qualification that you be</p> <p>21 recognized as a world-class expert and guru both</p> <p>22 inside and external to Google?</p> <p>23 A. Yes.</p> <p>24 Q. Was a qualification that you be</p> <p>25 recognized as a resource for innovation and</p>

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1	- Comparator6 -		- Comparator6 -
2	groundbreaking development?		function, business, and/or industry through advice
3	A. You bet.		counsel related to Google technologies and
4	Q. Was a qualification that you work on		business strategies?
5	one or more of the company's most complex projects		
6	and/or problems?		
7	A. Yes.		A. Yes.
8	Q. Was a qualification that you be able		Q. Was another that you act as a
9	to translate business needs into actionable		technical advisor to several project teams?
10	initiatives?		
11	A. Sure.		A. Yes.
12	Q. Was another qualification that you be		Q. Was another that you impact Google's
13	able to anticipate and solve problems across		long-term direction and success by contributing to
14	functional groups?		setting strategy objectives for key functional
15	A. That's what I've done for my whole		areas?
16	career, yeah.		A. Yes.
17	Q. Was another qualification that you be		Q. Was another that you shape the
18	able to own several complex projects and fully		direction and future of the function?
19	commit to their success?		A. Yes.
20	A. Yes. Again, that's what I did		Q. Was another to ensure that product
21	throughout my entire career.		and services are aligned with Google's current and
22	Q. Is another qualification that you		future needs and expectations?
23	would be able to apply advanced judgment to		A. Yes.
24	develop new solutions and think beyond existing		Q. Was another that you impact Google's
25	resolutions, assumptions, or current knowledge of		long-term direction and success -- well, you
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1	- Comparator6 -		- Comparator6 -
2	the area and industry?		already said yes to that.
3	A. Yeah, that's what senior executives		Was another that you shape the
4	do. That's -- yeah, that's what I was hired to		direction and future of the organization and
5	do.		industry by designing, developing, and
6	Q. Was another qualification that you		implementing groundbreaking technologies?
7	contribute to setting strategy objectives to the		A. Yes.
8	function?		Q. In your role at the time you joined
9	A. Yeah.		Google, did you understand your responsibilities
10	Q. Was another qualification that you		to include partnering closely with top global
11	arbitrate and advocate the technical issues?		companies as their most trusted Google technical
12	A. You better believe it.		advisor?
13	Q. Was another that you grow the gold		A. The -- yes. Though the one quibble
14	senior level talent pipeline?		might be around technical advisor but, yes, that
15	A. Uh-huh. Yes.		was -- the idea was for me to be a point of
16	Q. Was another that you have proven		contact for important clients in regulated
17	mastery of communication, negotiation, and		industries and their senior executives.
18	influence skills?		Q. And what's the quibble around
19	A. That was my -- you summed up my		technical advisor?
20	career in an -- in an -- in whatever, ten words.		A. Just -- just a question of what you
21	Q. Was another that you provide input to		mean by "technical."
22	executives?		Q. What do you understand it to mean?
23	A. Uh-huh. Yes. Sorry, no uh-huh.		A. Well, I understand it to mean to help
24	Yes.		them understand how Google Cloud technology
25	Q. Was another that you influence the		works. So in that sense, yes, if someone is

<p style="text-align: right;">Page 78</p> <p>1 - [Comparator6] -</p> <p>2 calling -- calling me to talk about, you know, how 3 do you program something, the answer is no. Again 4 as we established earlier, I don't code and I 5 don't program, but I do deal with senior 6 executives all the time. That's what I do.</p> <p>7 Q. With respect to your responsibilities 8 in the role that you were hired into --</p> <p>9 A. Uh-huh.</p> <p>10 Q. -- is one of your responsibilities 11 identifying Cloud-related designs, development, or 12 deployment friction points from the customers' 13 perspective and rallying your teams to work 14 through solutions?</p> <p>15 A. I'm sorry, I missed one word in 16 there. I apologize.</p> <p>17 Q. Sure. Did it include identifying 18 Cloud-related design, development, or deployment 19 friction points --</p> <p>20 A. Oh, friction point. Okay, that 21 what's I didn't hear. Thank you.</p> <p>22 Q. -- from the customers' perspective 23 and rally teams to work through solutions?</p> <p>24 A. Yes, absolutely.</p> <p>25 Q. Was one of your responsibilities to</p>	<p style="text-align: right;">Page 80</p> <p>1 - [Comparator6] -</p> <p>2 include public evangelism for emerging 3 technologies and speaking publicly on those 4 issues?</p> <p>5 A. Yes.</p> <p>6 Q. Did it involve doing deep dives with 7 internal engineering teams on the key cases for a 8 given launch?</p> <p>9 A. Yes.</p> <p>10 Q. Did it include leading a cross-Google 11 technical working team through a critical 12 engagement or through critical engagements?</p> <p>13 A. I'm sorry, say it again. I -- I 14 wasn't following.</p> <p>15 Q. Did it include leading a cross-Google 16 technical working team through critical 17 engagements to customers?</p> <p>18 A. Yes.</p> <p>19 Q. In your role, did you need to be at 20 home in a public speaking or a stage-type role?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. Did I need to be in my apartment in a 23 public speaking engagement?</p> <p>24 Q. In your role, did you need to be at 25 home on stage?</p>
<p style="text-align: right;">Page 79</p> <p>1 - [Comparator6] -</p> <p>2 work with customers and partners to define joint 3 initiative and co-create their transformation road 4 map?</p> <p>5 A. Absolutely.</p> <p>6 Q. Was part of your responsibilities 7 to tell the Google innovation story and help 8 translate it to actionable steps global companies 9 can take towards adoption?</p> <p>10 A. Yes.</p> <p>11 Q. Was part of your responsibilities to 12 collaborate across functional and product area 13 boundaries to bring the best of Google to the 14 customer?</p> <p>15 A. Yes.</p> <p>16 Q. With respect to the role in which you 17 were hired at Google, did your days include 18 private whiteboarding sessions with Google 19 customers?</p> <p>20 A. I'm sorry, you're asking whether the 21 role contemplated it or whether I did it?</p> <p>22 Q. Whether the role either contemplated 23 it or in fact you did it.</p> <p>24 A. A little bit of both, yeah.</p> <p>25 Q. Did the role, as you understood it,</p>	<p style="text-align: right;">Page 81</p> <p>1 - [Comparator6] -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. What does that mean?</p> <p>4 Q. Did you need to be comfortable 5 presenting publicly in your role?</p> <p>6 A. Sure.</p> <p>7 Q. Did you need to be comfortable or 8 qualified to provide private consultations with a 9 trusted advisor?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. If you can, go back to the 12 Box.</p> <p>13 A. Okay, give me a second. Okay, so I 14 need to refresh it again?</p> <p>15 Q. Yes, please.</p> <p>16 A. Give me one second.</p> <p>17 Okay, so there's now 32, 33 and 34?</p> <p>18 Q. Let me make sure I've got the 19 right --</p> <p>20 A. So I've got Tab 32 says "Solutions 21 Consultant," Tab 33 says "Technical Solutions 22 Consultant," Tab 34 says "GOOG-ROWE-5197."</p> <p>23 Q. Okay. If you can, open Tab 32.</p> <p>24 A. Okay, the solutions consultant. Got 25 it.</p>

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1	- Comparator6 -	1	- Comparator6 -
2	A. So I just want you aware: They --	2	MR. GAGE: Objection.
3	they asked that I delay -- delay more time so Hope	3	THE WITNESS: I'm sorry, I apologize.
4	could get the words -- even though I'm leaving	4	A. A few times over the course of the
5	time, I'm not leaving enough so I'm going to leave	5	months.
6	a little more time, just so you know.	6	Q. Did he tell you what efforts Google
7	So -- so the -- so I became the --	7	was undertaking to fill the role?
8	the head of financial services vertical.	8	A. I knew that he was actively
9	Q. And what organization or	9	interviewing candidates for the role and that I
10	organizational unit was that in at -- at Google?	10	knew that at some point he -- he or people offsite
11	A. It was in Tariq Shaukat's	11	presented some of the candidates to Diane Greene.
12	organization, which was industry -- I forget what	12	Q. Do you know who those candidates
13	it's called. You know, industry verticals and	13	were?
14	global alliances or something like that.	14	A. No.
15	Q. And what -- did you continue to	15	Q. Do you know the background or
16	report to Mr. Shaukat in that position?	16	experience of the candidates?
17	A. Yes.	17	A. No.
18	Q. How did it come to be that you moved	18	Q. Do you know whether Ms. Rowe was a
19	into the position of head of financial services	19	candidate?
20	vertical?	20	A. I did come to understand that, yes.
21	A. We spoke -- I don't know whether it	21	Q. When did you come to understand that?
22	was in person or on a hangout or on the phone --	22	A. Sometime -- sometime around the time
23	and he asked if I would take the role.	23	I accepted the role.
24	Q. And when you say "he," who are you	24	Q. How did you come to learn that?
25	referring to?	25	A. Don't recall specifically, but I
	Page 131		Page 133
1	- Comparator6 -	1	- Comparator6 -
2	A. Oh, I'm sorry. Tariq.	2	assume it was from Tariq.
3	Q. And when was that?	3	Q. Your discussions with Mr. Shaukat
4	A. Again, sometime December or January.	4	around the head of financial services vertical
5	I just don't remember specifically when.	5	role, was that in the context of a broader
6	Q. How close in time was it to you	6	reorganization of Tariq's group?
7	assuming the role?	7	A. You mean when he asked me to take on
8	A. Well, basically upon agreeing to do	8	the role or -- or my comments earlier than that?
9	it, I assumed it. There's then the gap to when it	9	Q. Either. Any of the times you
10	was announced.	10	discussed with him the financial services vertical
11	Q. And how long was the gap between when	11	role, was it in the context of talking about a
12	you assumed it and when it was announced?	12	broader reorganization?
13	A. I don't recall, but from the	13	A. Well, the -- in connection
14	documents you showed me this morning it suggested	14	with -- so, again, remembering that I was hired
15	it was a significant period of time.	15	for purposes of this, this role to get Google
16	Q. Prior to that call or hangout with	16	Cloud -- to create a strategy for Google Cloud
17	Mr. Shaukat, had you discussed the head of	17	with regulated industries and then cause that to
18	financial services vertical role with him before?	18	be executed, I thought since financial services
19	A. Only in the sense that it was -- it	19	was probably the anchor of that we really needed
20	was unfilled and I thought it was important to	20	someone to fill that role.
21	have it filled. I did not put myself forth as a	21	And I had a distinct role that
22	candidate for it.	22	was -- either role, it was distinct from that.
23	Q. When did you have that discussion	23	Mine was, as I think you pointed out earlier,
24	with him?	24	across the verticals and then -- so that's -- we
25	A. A few --	25	did talk about that. And then, you know, once he

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1 - [Comparator6] -	1 - [Comparator6] -
2 asked me to take on the role, I -- you know, we	2 would require you to execute strategies from a
3 obviously talked about it again then, too.	3 technical and business perspective?
4 Q. Did Mr. Shaukat tell you what the	4 A. Yes.
5 role entailed in that conversation where he asked	5 Q. Did you understand that the role
6 if you would take the role?	6 required extensive experiencing in managing
7 A. No, he didn't have to tell me what it	7 information technology?
8 was. I -- I knew -- I knew what the role	8 A. Yes.
9 entailed having -- I was already at Google Cloud	9 Q. Did you understand that the role
10 for probably six months and I saw what the other	10 required extensive experiencing in managing
11 vertical leads did and I didn't -- you know,	11 computer systems that support enterprise goals?
12 again, he was basically saying, you know, I need a	12 A. No.
13 senior executive in that role to, you know, bring	13 Q. Did you understand that the role
14 coherence to it and so that's what I -- what I	14 required a Ph.D. or a Master of Science degree in
15 did.	15 computer science or related technical field?
16 Q. Did you get -- did he give you or	16 A. No.
17 provide you with a copy of the job description?	17 Q. In the context of Mr. Shaukat's
18 A. Not to my recollection.	18 organization, what did he discuss with you in late
19 Q. Did anyone at that time provide you	19 2018/early 2009 -- late 2018/early 2019 regarding
20 with a copy of the job description?	20 changes that he wanted to make to his
21 A. Not to my recollection.	21 organizational structure.
22 Q. Were you ever asked to interview for	22 A. I don't recall conversations about
23 the role?	23 that.
24 A. Not to my recollection.	24 Q. Okay. If you can go to the Box,
25 Q. Did you ever interview for the role?	25 we're looking for --
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1 - [Comparator6] -	Page 137
2 A. Not to my recollection.	1 - [Comparator6] -
3 Q. Now, with respect to that role did	2 A. Hold on, I'm trying to find the Box.
4 you understand that your responsibilities would	3 Got it.
5 include driving Google's business by developing	4 Q. Does it have Tab 15?
6 product solutions?	5 A. Let me refresh it, hold on a second.
7 A. Yes.	6 Tab 15, yes?
8 Q. Did you understand that your	7 Q. And --
9 responsibilities in that role would include	8 A. Sorry. Tab 15 is what I'm looking
10 driving business by targeting -- by identifying	9 for?
11 M&A targets?	10 Q. Yes.
12 A. Yes.	11 A. Right, got it.
13 Q. Did you understand that your role	12 Q. We're up to Exhibit 18, Bates stamped
14 would include developing go-to market approaches	13 GOOG-ROWE-00056729 through 730.
15 that would resonate with the major companies in	14 (Whereupon, Exhibit 18 was marked at
16 the financial services?	15 this time.)
17 A. Yes.	16 Q. Mr. [Comparator6], do you recognize this
18 Q. Did you understand that the role	17 document?
19 required appropriate technical acumen as a crucial	18 A. Yes, it's an e-mail.
20 component?	19 Q. And you see that e-mail is dated
21 A. Yes.	20 October 13, 2019?
22 Q. Did you understand that the role	21 A. Right, that's a year later than the
23 required technical know-how?	22 time frame you've been referring me to. That's a
24 A. Yes.	23 year later than the period you've been referring
25 Q. Did you understand that the role	24 me to.
	25 Q. I understand. Thank you.

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<p>1 - Comparator6 -</p> <p>2 And so it was subsequent to that that</p> <p>3 Tariq said look, we're in this in-between period</p> <p>4 with a new CEO coming; I'm not inclined to go and</p> <p>5 recruit someone to come in and lead the financial</p> <p>6 services vertical right now; you have a deep</p> <p>7 financial services industry background; you know</p> <p>8 how to engage with senior executives, you -- we've</p> <p>9 had a good relationship in terms of you've known</p> <p>10 what to do and how to do it and how to progress</p> <p>11 important things here in the organization; you've</p> <p>12 made a lot of good contacts, created a good</p> <p>13 network and so would you become the head of the</p> <p>14 financial vertical; and then we can re-examine</p> <p>15 later on whether -- on an interim basis we can</p> <p>16 examine later on whether you should become -- you</p> <p>17 know, whether it's -- what we would do to fill</p> <p>18 that role on a more permanent basis, whether it's</p> <p>19 you or somebody else. So that's how it came to</p> <p>20 be.</p> <p>21 And, you know, I was -- when asked to</p> <p>22 serve I said, of course. I liked the opportunity</p> <p>23 and I said yes and did it. There was no</p> <p>24 additional compensation, there was no change to my</p> <p>25 compensation, there was no change to my level,</p>	<p>1 - Comparator6 -</p> <p>2 Q. And did he, in fact, use the word</p> <p>3 "interim"?</p> <p>4 A. He -- my recollection is he did. I</p> <p>5 don't recall that with certainty.</p> <p>6 Q. And did he tell you what would happen</p> <p>7 to you at the time you would examine later on</p> <p>8 if it was -- if you weren't going to be in that</p> <p>9 role permanently?</p> <p>10 A. I wasn't concerned about that.</p> <p>11 Q. My question was: Was it discussed?</p> <p>12 A. I don't recall it because I wasn't</p> <p>13 concerned about it.</p> <p>14 Q. Did Mr. Shaukat say whether he had</p> <p>15 spoken to anyone else with respect to putting you</p> <p>16 in the role?</p> <p>17 A. Not that I recall.</p> <p>18 Q. Did you speak with anyone else with</p> <p>19 respect to you assuming that role?</p> <p>20 A. I may have, but not that I recall.</p> <p>21 Q. Did you have an understanding as to</p> <p>22 whether anyone, other than Mr. Shaukat, was</p> <p>23 involved in the decision to put you into that</p> <p>24 role?</p> <p>25 A. I didn't have an understanding anyone</p>
<p>1 - Comparator6 -</p> <p>2 there was no change to my ladder; none of the</p> <p>3 things you have been pointing to earlier. It was</p> <p>4 taking the job I was doing before and saying okay,</p> <p>5 now this is the job you're doing.</p> <p>6 Q. Is that in the conversation that you</p> <p>7 described earlier where he asked if you wanted to</p> <p>8 take the role?</p> <p>9 A. Yeah, it -- I suspect it was a</p> <p>10 couple -- I don't really recall whether it was</p> <p>11 one conversation or two or three conversations.</p> <p>12 It was -- you know, it was a big deal to make the</p> <p>13 change and so I suspect we had a couple of</p> <p>14 conversations. I just don't recall with any</p> <p>15 precision how many we had and, you know,</p> <p>16 which -- what the -- what the substance</p> <p>17 was in each of the conversations, but that's</p> <p>18 effectively the record of the conversations.</p> <p>19 Q. Is there anything else that you</p> <p>20 recall him saying to you or you saying to him in</p> <p>21 the context of him offering you or asking you to</p> <p>22 take on the role of head of financial services?</p> <p>23 A. Not at this moment, but I expect</p> <p>24 there may be things that may refresh my</p> <p>25 recollection.</p>	<p>1 - Comparator6 -</p> <p>2 other than Mr. Shaukat was involved.</p> <p>3 Q. In any of those conversations you</p> <p>4 just described for me whether it was one or a</p> <p>5 series of conversations, was Ms. Rowe discussed?</p> <p>6 A. Not to my recollection.</p> <p>7 Q. Was there any conversation in</p> <p>8 connection with you taking on the head of</p> <p>9 financial services role where Ms. Rowe was</p> <p>10 discussed?</p> <p>11 A. I'm sorry, is that a different</p> <p>12 question than the one you just asked?</p> <p>13 Q. It is.</p> <p>14 A. Can you repeat it then? I'm not</p> <p>15 following.</p> <p>16 Q. Sure. So, more generally, was -- in</p> <p>17 any conversation where your -- where your change</p> <p>18 in role was discussed, was Ms. Rowe discussed?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. Well, at some point I came to know</p> <p>21 that she had, you know, interviewed for the job</p> <p>22 when Diane Greene was at -- at Google Cloud. So I</p> <p>23 don't know -- I'm -- I'm sorry, I -- I apologize.</p> <p>24 I'm just not following the -- the question you're</p> <p>25 trying -- what you're trying to get at.</p>

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<p>1 - Comparator6 -</p> <p>2 Q. We'll come back to it.</p> <p>3 A. Okay.</p> <p>4 Q. Aside from what you've already told 5 me, did Mr. Shaukat communicate anything to you in 6 addition about why he was selecting you for the 7 role?</p> <p>8 A. Yeah, I -- as I described, you know, 9 he knew that I knew my way around the financial 10 services industry. I had -- he was well-aware of 11 my background.</p> <p>12 I had been in financial services from 13 '87 to 2017. I had worked at the highest 14 levels of the industry. I've worked with senior 15 regulators, which was important to the role. He 16 knew about my experience as a -- as a partner at 17 McKinsey because he, too, had been a partner at 18 McKinsey and he knew what -- you know, what the 19 rigors are of being a partner at McKinsey and how 20 one engages the senior executives at McKinsey; and 21 he knew that I had -- he knew that I created in a 22 relatively short order a very strong network at 23 Google Cloud. I had people all over the 24 organization who were looking to me for support 25 and guidance.</p>	<p>1 - Comparator6 -</p> <p>2 A. With respect to regulatory 3 technology?</p> <p>4 Q. Deep expertise.</p> <p>5 A. Well, now you changed it to 6 "regulatory technology," right, that was your last 7 question?</p> <p>8 Q. My last question.</p> <p>9 A. Right. Do I have deep expertise with 10 respect to regulatory technology? In terms of the 11 people who do this for a living, I have as good 12 a -- a knowledge of it as most anyone can.</p> <p>13 Q. Do you have any understanding as to 14 how your knowledge of regulatory technology 15 compares to Ms. Rowe's knowledge?</p> <p>16 A. No.</p> <p>17 Q. Now, either internally or externally 18 did you designate yourself as the head of 19 financial services on an interim basis?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. Did I designate myself? Not to my 22 recollection -- well, I'm sorry, you are 23 asking -- is the keyword "interim" or "head of 24 financial" services or both?</p> <p>25 Q. Let's -- let -- let me ask you a</p>
<p>1 - Comparator6 -</p> <p>2 So -- and he was well-aware of those 3 things when we talked about the role.</p> <p>4 Q. At that time, did you consider 5 yourself to be an expert in technology?</p> <p>6 A. Excuse me --</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. I -- I don't know, and I'm not trying 9 to be clever. I had sufficient expertise in 10 technology to speak cogently with the customer 11 base at Google as well as with the sales force, as 12 well as with the engineers, as well as with the 13 in -- the infrastructure teams. So that's -- 14 that's -- that was the level of expertise I needed 15 to do my job.</p> <p>16 Q. Beyond having enough to speak 17 cogently about it, would you consider yourself to 18 be an expert in technology?</p> <p>19 A. I --</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. Yeah, my answer is my answer.</p> <p>22 Q. Do you consider yourself to have 23 deep, deep technological expertise with respect to 24 regulatory technology?</p> <p>25 MR. GAGE: Objection.</p>	<p>1 - Comparator6 -</p> <p>2 different question. One is: Did you tell people 3 that you were the head of financial services on an 4 interim basis?</p> <p>5 A. May have.</p> <p>6 Q. Who?</p> <p>7 A. I -- I -- I have no specific -- I'm 8 sorry the way I'm saying it, but I have no 9 specific recollection. Again, these are things 10 that didn't matter to me.</p> <p>11 Q. Did you -- when speaking of your 12 role, did you say head of financial services or 13 interim the head of financial services?</p> <p>14 A. I said head of financial services.</p> <p>15 Q. And is that how Mr. Shaukat also 16 referred to you?</p> <p>17 A. I don't know.</p> <p>18 Q. And in the head of financial services 19 role, did you meet with Ruth Porat?</p> <p>20 A. Well, I met with Ruth several times 21 while I was at Google Alphabet. We had a meeting 22 with Mark Carney who was the governor of the Bank 23 of England, along with -- along with Thomas Kurian 24 and a couple of other people, and I presented on 25 the Cloud to a -- to a -- to Karney and a couple</p>

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<p style="text-align: right;">Page 150</p> <p>1 - [Comparator6] -</p> <p>2 of his colleagues. We met with Craig Phillips,</p> <p>3 who was a senior a -- a senior official at the</p> <p>4 Treasury Department working for Steven Mnuchin who</p> <p>5 both Ruth and I knew from Morgan Stanley days, and</p> <p>6 we talked about the financial modernization and</p> <p>7 the role of Cloud in financial modernization.</p> <p>8 In addition, the guy who was head of</p> <p>9 compliance at GP abruptly resigned and Ruth called</p> <p>10 me late on a Friday to say could I please get</p> <p>11 involved and figure out whether there were issues</p> <p>12 of concern there and how we might effectively</p> <p>13 ensure good controls at Google Pay; and in</p> <p>14 addition, she asked me to help in the search for a</p> <p>15 successor for that person.</p> <p>16 So those are among the contacts I had</p> <p>17 with a -- with Ruth after -- after the -- and --</p> <p>18 and -- and I -- and, and, you know, after I became</p> <p>19 head of -- of the vertical, but they were not</p> <p>20 occasioned by me. She -- she found me and she</p> <p>21 knew me. We probably had, I don't know, three or</p> <p>22 four hallway conversations as well.</p> <p>23 Q. At some point in time, did you</p> <p>24 discuss with Mr. Shaukat what role Ms. Rowe would</p> <p>25 have going forward? And now I'm focusing on the</p>	<p style="text-align: right;">Page 152</p> <p>1 - [Comparator6] -</p> <p>2 financial services, but that she would have a</p> <p>3 broader role as OC -- in OCTO. It would not be</p> <p>4 one where she would effectively be doing financial</p> <p>5 services -- dedicated financial services work. In</p> <p>6 OCTO, she'd be covering many industries.</p> <p>7 Q. Prior to that -- when was that</p> <p>8 conversation?</p> <p>9 A. I don't recall specifically. It was</p> <p>10 sometime after January and sometime before April.</p> <p>11 Q. Prior to that, did you have any</p> <p>12 discussions with Mr. Shaukat regarding Ms. Rowe</p> <p>13 reporting in to you?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. We may have. Again, I was -- I -- I</p> <p>16 probably told him I was happy to have her work</p> <p>17 with me. I -- you know, as I said to you earlier,</p> <p>18 I -- I thought she was someone who I could work</p> <p>19 with and we really -- I could help advance her</p> <p>20 career had she -- had she worked with me.</p> <p>21 Q. Did you discuss with Mr. Shaukat what</p> <p>22 her responsibilities would be relative to yours?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. I'm sorry, when -- when she went to</p> <p>25 OCTO?</p>
<p style="text-align: right;">Page 151</p> <p>1 - [Comparator6] -</p> <p>2 time after the conversation that you just</p> <p>3 described as to with respect to how you learned</p> <p>4 you were going to have that role.</p> <p>5 A. Yeah, I -- I talked about it. You</p> <p>6 know, basically, it was between him and Ulku as to</p> <p>7 how they were going to go forward. I certainly,</p> <p>8 again as I indicated earlier, welcomed her into</p> <p>9 the group and would have wished to have been</p> <p>10 there, but that was between -- the two of them</p> <p>11 discussed it. All I cared about was getting some</p> <p>12 clarity so that the organization knew who was</p> <p>13 doing what.</p> <p>14 Q. Tell me everything you said to Mr.</p> <p>15 Shaukat and everything he said to you with respect</p> <p>16 to what Ms. Rowe's role would be going forward.</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. So I came to learn at some point</p> <p>19 that she didn't -- that she wanted -- that she</p> <p>20 didn't find working in the Cloud, in the financial</p> <p>21 services vertical acceptable and that she was</p> <p>22 going to transition back to OCTO; and that</p> <p>23 the -- the conversation I had with Tariq about it</p> <p>24 was he let me know that she was doing that and</p> <p>25 that in doing that she would not be dedicated to</p>	<p style="text-align: right;">Page 153</p> <p>1 - [Comparator6] -</p> <p>2 Q. Prior to that.</p> <p>3 A. When what --</p> <p>4 Q. During the period of time</p> <p>5 between when you became the head of financial</p> <p>6 services in late 2018/early 2019 and when she left</p> <p>7 to go back to OCTO --</p> <p>8 A. Right.</p> <p>9 Q. -- did you discuss with Mr. Shaukat</p> <p>10 how -- what her role and responsibilities would be</p> <p>11 as compared to what your role and responsibilities</p> <p>12 would be?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. I don't recall a specific</p> <p>15 conversation about it, but I viewed her as my</p> <p>16 partner and wanted to -- you know, and as</p> <p>17 welcome -- was open to having her work with me and</p> <p>18 to figure out some way to -- to do that together.</p> <p>19 Q. What did you understand her role and</p> <p>20 responsibilities to be at that time?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. All -- all I knew about what Ulku was</p> <p>23 doing was that she was doing a lot of client</p> <p>24 outreach and a lot of presentat -- you know,</p> <p>25 presentations at conferences which, you know,</p>